

Your
Seattle
City Light

Put a copy of this in our PCB file, please 980.6

Memorandum

Croll **980.6**
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DATE: February 28, 1985
TO: Mayor Charles Royer
FROM: Randall W. Hardy, Superintendent
SUBJECT: Follow-up on the Cabinet Retreat

In reviewing your memo of February 13, 1985 on the above subject, there are two specific topics where City Light has been identified as the lead agency: (1) the closure of the Lake Union Steam Plant, and (2) PCB problems and solutions. Per your instructions, we have prepared implementation plans detailing the steps the Department will take in handling these issues.

Also, City Light has prepared an implementation plan identifying the Department's plan for providing first-line supervisors with training to develop and/or enhance their skills to be effective supervisors. The Department is working with City Personnel to develop a Supervisory Development Program tailored to the needs of the utility. This program is to be offered in addition to the Department's version of the Advanced Management Training program.

We will submit by March 7 a list and description of other departmental activities which fall under the retreat themes.

Should you have any questions, please call me.

RWH:sms

cc: Hardy
Saven
Macdonald
Fletcher
Garman
Croll
Rheubottom
Sickler
Chrono
File

THEME: CLEANUP THE CITY/ENVIRONMENT

SEATTLE CITY LIGHT
SOLUTIONS TO PCB CONTAMINATION
IMPLEMENTATION PLAN

February 28, 1985

I. PCB Problems and Solutions

City Light began a program of systematic inventories of hazardous materials years ago. In that context, City Light is continuing its efforts to prevent and clean up PCB contamination of the Department's facilities, equipment, and items or materials to be surplused and/or sold as scrap material. In addition, efforts to initiate cleanup at affected sites outside of the utility where City Light has contributed to PCB contamination are now underway. The Department is looking at options for disposal of PCB contaminated oil, including a high efficiency regional incineration facility for toxic wastes such as PCB. We are also seeking acceptable locations which met EPA standards for disposing of scrap metal, surplus equipment and contaminated soil.

It should be noted that technology continues to change, and more effective and safe techniques for disposal of PCB contaminated materials may be developed. City Light will continue to maintain up-to-date knowledge on the subject and techniques of PCB disposal as well as handling of other toxic materials and problems.

Through its participation on the Environmental Coordinating Committee, City Light will keep abreast of PCB-related problems in other City departments and will provide assistance as necessary.

Planned Activities

Target Dates

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|--|---------|
| 1. Update comprehensive evaluation of PCB contamination in departmental facilities, identify scope of problems and establish departmental goals and priorities for handling PCBs. | 5/15/85 |
| 2. Revise present policy and procedure for proper handling and disposal of PCBs in order to prevent PCB contamination and related problems both within and beyond the utility. This policy will spell out roles and responsibilities and identify who should be notified of potential problem areas. | 9/15/85 |
| 3. Assess existing programs for handling PCB related problems to determine whether they are: | |

- consistent with the Department's goals, priorities and established policies and procedures; 8/15/85
 - measure the effectiveness of the program; 8/15/85
 - review schedules; and 8/15/85
 - effect modifications to schedules and/or programs as necessary. Ongoing
4. Begin developing new programs on an ongoing basis which will further departmental efforts to reduce and/or eliminate PCB contamination and related problems affecting the Department. 8/15/85
 5. As part of the Worker Right-To-Know program, the Department will keep employees informed of associated concerns and proper handling of PCB contaminated equipment and property. Ongoing
 6. The Department will continue to provide employees with proper protective clothing and equipment for handling PCB contaminated items. The Safety Office will continue to seek up-to-date information on ways to protect employees who may be affected by PCBs. Ongoing
 7. Prepare and submit reports for the Superintendent informing him of the status of problems for handling PCB related problems and making recommendations for actions and changes as necessary. Quarterly (starting second quarter of 1985)

II. Current Activities and Programs

A. Lake Union Steam Plant (LUSP)

There is 19,310 bbl (811,000 gallons) of fuel oil containing an average of about 75 ppm PCB (this is above the 50 ppm PCB limit) stored at the LUSP. On April 23, 1984, EPA was notified of this situation. Prior to closure of the LUSP and in order to comply with EPA regulations, City Light intends to dispose of PCBs. Because of environmental and legal risks, there are limitations on cleanup options and time constraints for completion of cleanup efforts established by EPA to be taken into consideration. EPA may fine City Light beginning April 23, 1985, if cleanup efforts have not

been completed. It is our judgment that the worst case is unlikely, and the amount of fine is unknown.

Planned Activities

Target Dates

- | | |
|--|---|
| 1. Department's recommendation to the Mayor on selection of contractor on alternative approaches proposed method and costs of cleanup. | Early March |
| 2. Council hearing to discuss proposed PCB cleanup methods, selection of contractor or approval of alternative methods and appropriation of funds. Vote would be at a later meeting. | March, 1985 |
| 3. Negotiate necessary documents for contractor on process selected. | Projected for April 1985 |
| 4. Obtain or assist in securing regulatory permits as necessary. | Projected for late Third Quarter 1985 |
| 5. Completion of cleanup. | Last quarter 1985 to second quarter 1986 depending on method of cleanup and the selected process. |

B. Scrap Metal PCB Cleanup

Investigations by EPA have led to the identification of scrap metal sites where PCB contamination has been discovered. It has been established that City Light has sold transformers and other unneeded equipment to these dealers; we are, therefore, responsible for cleaning up PCB contamination to which our equipment contributed. Cleanup measures must meet standards and deadlines established by EPA or City Light could face EPA takeover of sites. Seattle City Light would be billed for costs. EPA has indicated that they may have identified several other sites where City Light has sold scrap equipment contaminated by PCBs.

- Strandley Site. A consultant was retained by Seattle City Light, Tacoma City Light and Strandley to clean up PCB contamination resulting from scrap equipment sold to this dealer. Efforts to clean up this site include site stabilization, site sampling by consultant, analysis of samples by contractor and development of options for clean up by consultant. The Department estimates it will make a recommendation on the selected process to be used for cleanup by early in the third quarter of 1985. The estimated date of site cleanup by affected parties is October, 1985.
- Williams and Son. This site near Centralia was cleaned up by EPA early this year. While City Light sold light ballasts and

distribution transformers to this dealer, it is unclear if the utility will be billed by EPA. The City is still considering a claim from Williams.

C. Georgetown Steam Plant

Testing in late 1984 indicated some PCB contaminated soil on the steam plant grounds and in the flume leading to the Duwamish River. After involving METRO, Washington State Department of Energy (DOE) and the Environmental Protection Agency (EPA), and conducting further tests, City Light stabilized the grounds with a plastic tarp and the flume with sandbags. Further testing and cleanup will occur in 1985.

D. PCB Inspection Programs

● Network Transformer and Vault Inspection

Approximately 750 network transformers and vaults are being tested for PCB contamination. Beginning in late 1984, 75 units were tested; 22 of which are contaminated. The Department will continue to inspect and test all network vaults and transformers over the next two years for possible PCB contamination. It is anticipated all network vaults and transformers will be inspected by 1986. These transformers are especially important because of a new EPA rulemaking on such transformers and fire hazards.

● Poletop - Small Distribution Transformers

City Light has approximately 50,000 transformers of this type which are being tested for PCBs as they are removed for disposal, repair and/or surplused. It is anticipated that completion of testing and removal of PCB contamination will occur over the next ten years.

● Energized Substations

For substations which are energized and where construction is planned, conduct inspections prior to earthmoving activities to identify and excavate contaminated soil and transport to hazardous waste landfills.

Preliminary testing of Bothell, Canal and Delridge substations were completed in 1984 with preliminary testing of South and Duwamish substations to occur before the end of the first quarter of 1985. The remaining 11 substations will receive preliminary testing by early 1986.

● Surplused Unit Substations

The Department is conducting preliminary tests for possible PCB contamination at substations being taken out of service as a result of conversion from 4 to 26 kV.

Preliminary testing of 3 substations surplused in 1984 has been completed and 5 substations expected to be surplused in 1985 will also be tested by December, 1985. The remaining 9 units to be surplused will be tested as they are decommissioned over the next several years.